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*Attorneys for Defendants World
Wrestling Entertainment, LLC, and
Fanatics, LLC*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

WESLEY EISOLD, an individual,

Plaintiff,

vs.

CODY GARRETT RUNNELS, an
individual, WORLD WRESTLING
ENTERTAINMENT, LLC, a limited
Liability company; and FANATICS,
LLC, a limited liability company,

Defendants.

Case No.: 2:24-CV-07516-AB(MARx)
[Hon. André Birotte Jr.]

**JOINT STIPULATION TO
EXTEND TIME TO RESPOND TO
PLAINTIFF'S SECOND
AMENDED COMPLAINT**

Action Filed:
September 4, 2024

Second Amended Complaint Filed:
December 16, 2024

Current Response Date:
June 7, 2025

New Response Date:
July 11, 2025

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JOINT STIPULATION

This Joint Stipulation is entered into by and between Defendants Cody Runnels (“Runnels”), World Wrestling Entertainment, LLC (“WWE”), Fanatics, LLC (“Fanatics”), and Plaintiff Wesley Eisold (“Eisold”) (Runnels, WWE, Fanatics, and Eisold are collectively referred to hereinafter as the “Parties”), by and through their respective counsel.

WHEREAS, Eisold filed his Complaint against Defendants on September 9, 2024 (Dkt. No. 1);

WHEREAS, on October 10, 2024, Eisold, WWE, and Fanatics stipulated to a thirty-day extension of time for WWE and Fanatics to respond to Eisold’s Complaint (Dkt. No. 15), and Eisold and Runnels later entered into a stipulation to coordinate his response with the other Defendants on October 25, 2024 (Dkt. No. 19);

WHEREAS, on October 24, 2024, the Parties stipulated that Eisold would amend his Complaint to correct an error in Fanatics’ name (Fanatics was erroneously sued as Fanatics Holdings, Inc. instead of Fanatics, LLC) and that this amendment should not constitute Eisold’s amendment as of right under Rule 15(a) of the Federal Rules of Civil Procedure (Dkt. No. 17);

WHEREAS, on October 30, 2024, the Court approved the Parties’ October 24, 2024, Stipulation to Amend (Dkt. No. 22);

WHEREAS, on November 1, 2024, Eisold filed, pursuant to the October 30, 2024, Order, his First Amended Complaint (Dkt. No. 23);

WHEREAS, on November 22, 2024, WWE and Fanatics filed a Motion to Dismiss Plaintiff’s First Amended Complaint (Dkt. No. 26), in which Runnels joined, along with his own Motion to Dismiss (Dkt. Nos. 28, 29);

WHEREAS, on November 26, 2024, the Court entered an Order setting the Rule 26 Scheduling Conference (Dkt. No. 30);

WHEREAS, on December 13, 2024, Eisold filed his Second Amended Complaint (Dkt. No. 34);

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1 WHEREAS, on December 16, 2024, the Court issued a Notice of Deficiency
2 with respect to Eisold's Second Amended Complaint on the basis that Eisold needed a
3 stipulation or leave of court to file the amended pleading;

4 WHEREAS, on December 27, 2024, the Parties' stipulated to an extension of
5 time for Defendants to respond to Eisold's Second Amended Complaint to January 17,
6 2024 (Dkt. No. 38), which the Court approved on December 30, 2024 (Dkt. No. 39).

7 WHEREAS, on January 13, 2025, counsel for the Parties met and conferred on
8 Plaintiff's Second Amended Complaint, and agreed that, due to (1) operational and
9 staffing challenges for the Parties due to the recent wildfire disaster in California, (2)
10 the defense's need to coordinate filings among multiple parties; and (3) Plaintiff's
11 counsel's vacation travel commitments, good cause exists to extend the current
12 response and briefing schedule. The Parties further conferred and agreed to jointly
13 request a continuance of the scheduling conference to preserve resources while the
14 pleadings are unsettled and the scope of discovery uncertain.

15 WHEREAS, on January 21, 2025, the Court approved the Parties' stipulation
16 and ordered that Eisold, WWE, and Fanatics would respond to Plaintiffs' Second
17 Amended Complaint by no later than February 21, 2025. Plaintiff's opposition was
18 ordered due March 14, 2025, and Defendants' reply due March 28, 2025. The Parties'
19 initial case scheduling conference was continued to April 25, 2025, at 10:00 AM (Dkt.
20 No. 41).

21 WHEREAS, on February 14, 2025, the Parties filed a further stipulation to
22 extend the time for Defendants to respond to Plaintiff's Second Amended Complaint
23 up to, and including, April 7, 2025. This extension was based on the Parties' actively
24 engagement in ongoing discussions to resolve this matter and the Parties' desire to
25 expend their respective resources on pursuing these discussions and informal
26 information sharing, rather than briefing a motion to dismiss at this time.

27 WHEREAS, on February 21, 2025, the Court approved the Parties' stipulation
28 and set Defendants' response date to April 7, 2025 (Dkt. 48).

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1 WHEREAS, on April 2, 2025, the Parties filed an additional stipulation to extend
2 the time for Defendants to respond to Plaintiff's Second Amended Complaint up to,
3 and including, June 6, 2025 (Dkt. 49). The Parties also requested that the Scheduling
4 Conference set for April 25, 20-25 be re-set to a date on or after July 25, 2025 (Dkt.
5 49). These extensions were based on the Parties remaining in active settlement
6 discussions and desiring to expend resources in a manner aimed at resolving this
7 dispute amicably.

8 WHEREAS, on April 4, 2025, the Court approved the Parties' stipulation and
9 set Defendants' response date to June 7, 2025, and re-set the Scheduling Conference to
10 July 25, 2025 (Dkt. 50).

11 WHEREAS, the Parties have continued discussions to resolve this matter,
12 including Defendants' disclosures of additional information to Plaintiff's counsel for
13 purposes of settlement governed by the operative protective order, and further
14 exchanges in settlement demands and terms. Since the last extension request,
15 Defendants have made additional disclosures to Plaintiff's counsel pursuant to the
16 operative protective order, and Plaintiff's counsel has revised Plaintiff's settlement
17 demand. Defendants are evaluating Plaintiff's revised demand and expect to promptly
18 respond to it within the next week. There remains additional structuring and scope
19 issues in a potential resolution that are being considered by the Parties that is taking
20 additional time to due diligence. The Parties thank the Court for affording them the
21 opportunity to focus their resources on resolving this matter.

22 As such, the Parties, by and through their counsel, hereby stipulate and
23 respectfully request of the Court as follows:

24 The responsive pleading of Runnels, WWE, and Fanatics may be filed on or
25 before July 11, 2025. Once a responsive pleading is filed, the Parties shall work
26 together to discuss an appropriate briefing and hearing schedule, subject to the Court's
27 approval.

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1 This joint stipulation shall supersede all prior stipulations and orders.

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3 Dated: May 29, 2025

HOLLAND & KNIGHT LLP

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5 /s/ Stacey H. Wang
Stacey H. Wang, Esq.

6 *Attorneys for Defendants*
7 *World Wrestling Entertainment, LLC and*
8 *Fanatics, LLC*

9 Dated: May 29, 2025

DANIEL EBELING MACCIA AND COHEN, LLP

10
11 /s/ Danielle N. Garno
Danielle N. Garno, Esq.

12 *Attorneys for Defendants*
13 *World Wrestling Entertainment, LLC and*
14 *Fanatics, LLC*

15 Dated: May 29, 2025

KING HOLMES PATERNO AND SORIANO LLP

16
17 /s/ Heather Pickerell
Heather Pickerell, Esq.

18 *Attorneys for Plaintiff, Wesley Eisold*

19
20 Dated: May 29, 2025

JAYARAM PLLC

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22 /s/ Vivek Jayaram
Vivek Jayaram, Esq.

23 *Attorney for Defendant, Cody Runnels*
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DECLARATION OF CONSENT TO ELECTRONIC SIGNATURE:

I, Stacey H. Wang, attest pursuant to L.R. 5-4.3.4 of the United States District Court for the Central District of California that the above signatories, on whose behalf the filing is submitted, concurs in the filing's content and has authorized the filing.

Dated: May 29, 2025

/s/ Stacey H. Wang
Stacey H. Wang, Esq.

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